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8 **UNITED STATES DISTRICT COURT**

9 **EASTERN DISTRICT OF CALIFORNIA**

10 MATTHEW PETERSON, SADIE FLODING,
11 COLIN STRUB, JODY BARRY, TEISCHA
12 BENSON, LYNNETTA KLAM, and LORI
13 DAVIES,

Case No.: 1:22-cv-00701 JLT-BAK (SKO)

14 Plaintiff(s),
15 v.
16 **DECLARATION OF LINDSAY LIEN
17 INCORPORATED, a California corporation;
18 DOES 1-10, INCLUSIVE; and ROE
19 ENTITIES 1-10, INCLUSIVE,
20 Defendant(s).**

14 **DECLARATION OF LINDSAY LIEN
15 AMIN IN SUPPORT OF PLAINTIFFS'
16 RESPONSE TO DEFENDANT'S MOTION
17 TO DISMISS**

18 I, Lindsay Lien Amin, declare as follows:
19
20 1. I represent the Plaintiffs in the above-referenced matter.
21

- 1 2. Defendant filed a declaration containing plaintiffs' dates of birth and Plaintiff Jody Barry's
2 complete social security number.
- 3 3. When asked for a remedy, Defendant withdrew the declaration but did not respond whether
3 they would be willing to pay for credit monitoring for Ms. Barry, as has been ordered by
3 other federal courts.
- 4 4. The undersigned has frequently recovered settlements for food poisoning victims that are
4 several times the value of a claimant's medical expenses, as medical expenses are only one
4 part of a claim.
- 5 5. Attached hereto as Exhibit 1 is a true and correct copy of the report of Dr. Theodoros
6 Kelesidis.
- 7 6. Attached hereto as Exhibit 2 is a true and correct copy of excerpts of the deposition of Jody
7 Barry taken December 21, 2023.
- 8 7. Attached hereto as Exhibit 3 is a true and correct copy of excerpts of the deposition of
8 Teischa Benson taken January 10, 2023.
- 9 8. Attached hereto as Exhibit 4 is a true and correct copy of excerpts of the deposition of Lori
10 Davies taken January 11, 2024.
- 11 9. Attached hereto as Exhibit 5 is a true and correct copy of excerpts of the deposition of
11 Sadie Floding taken January 17, 2024.
- 12 10. Attached hereto as Exhibit 6 is a true and correct copy of excerpts of the deposition of
12 Lynnetta Klam taken January 19, 2024.
- 13 11. Attached hereto as Exhibit 7 is a true and correct copy of excerpts of the deposition of
13 Matthew Peterson taken January 23, 2024.
- 14 12. Attached hereto as Exhibit 8 is a true and correct copy of excerpts of the deposition of
14 Colin Strub taken January 9, 2024.
- 15 13. Attached hereto as Exhibit 9 is a true and correct copy of the report of Dr. Scott Choi.
- 16 14. Attached hereto as Exhibit 10 is a true and correct copy of the Order Denying Def.'s Mtn.
17 to Dismiss, *Angelo, et al., v. Thomson Int'l, Inc.*, 1:21-cv-01609-JLT-CDB, (U.S.D.C.,
17 E.D. Cal., Apr. 24, 2024.)

1 I declare under penalty of perjury under the laws of the State of Wisconsin that the
2 foregoing is true and correct.

3 Executed on November 18, 2024, in Hudson, Wisconsin.

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